

RUSSELL E. MARSH, ESQUIRE  
Nevada Bar No. 11198  
WRIGHT STANISH & WINCKLER  
300 S. Fourth Street  
Suite 701  
Las Vegas, NV 89101  
Telephone: (702) 382-4004  
Facsimile: (702) 382-4800  
Attorney for Charles Ray Bell, Jr.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	
	)	Case No. 2:14-cr-00138-JAD-VCF
Plaintiff,	)	
	)	
vs.	)	
	)	
CHARLES RAY BELL, JR.,	)	
	)	
Defendant.	)	

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**STIPULATION TO WITHDRAW MOTION**

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bodgen, United States of Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Russell E. Marsh, Esquire, Wright Stanish & Winckler, counsel for Defendant, that the Defendant be allowed to withdraw his Motion for Production of Additional Police Reports (Docket #35), with leave to file an amended motion, if necessary.

This stipulation is entered for the following reasons:

1. On December 1, 2014, the Defendant, through prior counsel, filed a Motion for Production of Additional Police Reports (the "Motion"). *See* Docket #35. The parties filed several stipulations to extend the time for the government to respond to the Motion.

2. The Government filed its response on March 23, 2015 (Docket #53). Pursuant to previous Stipulation (Docket #54), the Defendant's reply was due on April 6, 2015. *See* Docket #55. This matter is set for a hearing on April 16, 2015 at 10:00 am (Docket #56).

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1           3.       Defendant Bell requests that he be allowed to withdraw his motion, with leave to file  
2 an amended motion if Defendant is unable to obtain the materials requested through other means.  
3 The Government does not oppose this request.

4           4.       The parties request that the previously scheduled hearing remain set for purposes of  
5 a status hearing, and that Defendant be transported for this hearing.

6           Dated: April 6, 2015.

7 DANIEL G. BOGDEN  
8 UNITED STATES ATTORNEY

WRIGHT STANISH & WINCKLER

9 BY /s/ Phillip N. Smith, Jr.  
10 PHILLIP N. SMITH, JR.  
11 Assistant United States Attorney  
12 333 Las Vegas Boulevard South  
13 Suite 5000  
14 Las Vegas, NV 89101

BY /s/ Russell E. Marsh  
RUSSELL E. MARSH, ESQUIRE  
300 S. Fourth Street  
Suite 701  
Las Vegas, NV 89101  
Attorney for Charles Ray Bell, Jr.

**ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore,

IT IS HEREBY ORDERED that the Defendant's Motion for Production of Additional Police Reports (Docket #35) is hereby withdrawn and dismissed without prejudice to the filing of an amended motion. This case is scheduled for a status hearing on April 16, 2015, at 10:00 a.m. Defendant will be transported for this hearing.

DATED this 6th day of April, 2015.



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CAM FERENBACH  
UNITED STATES MAGISTRATE JUDGE